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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IRONSHORE SPECIALTY INSURANCE
COMPANY,

Plaintiff,

v.

CEDAR GROVE COMPOSTING, INC.,
CEDAR GROVE COMPOSTING FACILITY,
and CEDAR GROVE, INC.,

Defendants.

Case No.: 15-CV-975 (NRB)

**REPLY DECLARATION OF
ANTHONY I. GIACOBBE, JR.**

STATE OF NEW YORK,
COUNTY OF NEW YORK

ANTHONY I. GIACOBBE, JR., pursuant to 28 U.S.C. § 1746 and under
the penalties of perjury, declares:

1. I am of counsel to Zeichner Ellman & Krause LLP, attorneys for
defendant Cedar Gove Composting, Inc. and a member of this Court. I make this
declaration in support of Cedar Grove Composting, Inc.'s Motion for Stay Pending
Determination of Proper Forum Under First-to-File Rule.


2. Annexed as Exhibit A is a copy of Defendant's Opposition to
Plaintiff's Motion for Determination of Proper Forum Under First-to-File Rule, which was

submitted to the Western District of Washington in connection with Cedar Gove's pending first-to-file motion.

3. Annexed as Exhibit B is a copy of Plaintiff's Reply in Support of Motion for Determination of Proper Forum Under First-to-File Rule, which was submitted to the Western District of Washington in connection with the pending first-to-file motion.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 24, 2015



ANTHONY I. GIACOBBE, JR.